

EXHIBIT B

1 The Amazon Insider Defendants' Role in the Scheme

2 1. **Oscar Pineda:** Oscar Pineda began his employment with Amazon as a
3 fulfillment center associate in Hillsboro, Oregon in October 2019. REKK recruited Oscar Pineda
4 to facilitate returns fraud and Oscar Pineda agreed to approve customer returns for products that
5 were not in fact returned. REKK and Oscar Pineda's communications were conducted via
6 interstate electronic Telegraph channels. In April and May 2023, Oscar Pineda fraudulently
7 approved returns for 5 orders at REKK's request, causing Amazon to refund over \$13,000 to
8 REKK users. REKK paid Oscar Pineda a total of \$6,000 via interest electronic financial
9 transactions for his participation in the unlawful scheme.

10 2. **Janiyah Alford:** Janiyah Alford began her employment with Amazon as a
11 fulfillment center associate in Chattanooga, Tennessee in January 2023. REKK recruited
12 Janiyah Alford to facilitate returns fraud and Janiyah Alford agreed to approve customer returns
13 for products that were not in fact returned. Between February and May 2023, Janiyah Alford
14 fraudulently approved product returns for 76 orders at REKK's request, causing Amazon to
15 refund over \$100,000 to REKK users. REKK paid Janiyah Alford via interstate electronic
16 financial transactions a total of \$3,500 for her participation in the unlawful scheme. REKK and
17 Janiyah Alford's communications were conducted via interstate electronic telegraph channels
18 and text messages.

19 3. **Noah Page:** Noah Page began his employment with Amazon as a fulfillment
20 center associate in Chattanooga, Tennessee in January 2023. REKK recruited Noah Page to
21 facilitate returns fraud and Noah Page agreed to approve customer returns for products that were
22 not in fact returned. In April 2023, Noah Page fraudulently approved product returns for 56
23 orders, causing Amazon to refund over \$75,000 to REKK users. REKK paid Noah Page at least
24 \$5,000 via interstate electronic financial transactions for his participation in the unlawful
25 scheme. REKK and Noah Page's communications were conducted via interstate electronic
26 telegraph channels and text messages.

1 4. **William Walsh:** William Walsh began his employment with Amazon as a
2 fulfillment center associate in Sparrows Point, Maryland in June 2022. REKK recruited William
3 Walsh to facilitate returns fraud and William Walsh agreed to approve customer returns for
4 products that were not in fact returned. REKK and William Walsh's communications were
5 conducted via interstate electronic Telegraph channels. In February and March 2023, William
6 Walsh fraudulently approved product returns for 14 customers orders, causing Amazon to refund
7 over \$23,000 to REKK users. On information and belief, REKK paid William Walsh an amount
8 presently unknown to Amazon via interstate electronic financial transactions for his participation
9 in the unlawful scheme.

10 5. **Luke Colvin:** Luke Colvin began his employment with Amazon as a fulfillment
11 center associate in Chattanooga, Tennessee in January 2021. REKK recruited Luke Colvin to
12 facilitate returns fraud and Luke Colvin agreed to approve customer returns for products that
13 were not in fact returned. REKK and Luke Colvin's communications were conducted via
14 interstate electronic Telegraph channels. In March 2023, Luke Colvin fraudulently approved
15 returns for 64 orders at REKK's request, causing Amazon to refund REKK users over \$109,000.
16 REKK paid Luke Colvin \$5,200 via interstate electronic financial transactions for his
17 participation in the unlawful scheme.

18 6. **Skylar Robinson:** Skylar Robinson began his employment with Amazon as a
19 fulfillment center associate in Lexington, Kentucky in June 2022. REKK recruited Skylar
20 Robinson to facilitate returns fraud and Skylar Robinson agreed to approve customer returns for
21 products that were not in fact returned. REKK and Skylar Robinson's communications were
22 conducted via interstate electronic Telegraph channels. From January through May, 2023,
23 Skylar Robinson fraudulently approved returns for 189 orders, causing Amazon to refund REKK
24 users over \$175,000. On information and belief, REKK paid Robison an amount presently
25 unknown to Amazon via interstate electronic financial transactions for his participation in the
26 unlawful scheme.

1 7. **Alejandro Taveras:** Alejandro Taveras began his employment with Amazon as
2 a fulfillment center associate in Avenel, New Jersey, in June 2022. REKK recruited Alejandro
3 Taveras to facilitate returns fraud and Alejandro Taveras agreed to approve customers returns for
4 products that were not in fact returned. REKK and Alejandro Taveras' communications were
5 conducted via interstate electronic Telegraph channels. From January through April, 2023,
6 Alejandro Taveras fraudulently approved returns for 52 orders, causing Amazon to refund
7 REKK users over \$67,000. REKK paid Alejandro Taveras an amount presently unknown to
8 Amazon via interstate electronic financial transactions for his participation in the unlawful
9 scheme.

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